

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

EVERY DOOR DIRECT MAIL RETAIL DISCOUNT

Docket No. R2020-2

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
CHAIRMAN'S INFORMATION REQUEST NO. 1**  
(June 5, 2020)

The Postal Service hereby responds to Chairman's Information Request No. 1, issued on June 4, 2020. The question is stated verbatim and is followed by the response.

Respectfully submitted,  
UNITED STATES POSTAL SERVICE

By its attorneys:

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## **RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1**

The Postal Service asserts that it is electing to generate unused rate adjustment authority from the Every Door Direct Mail Retail discount pursuant to 39 C.F.R. §§ 3030.506(b) and 3030.512(b)(10). Notice at 4. Pursuant to 39 C.F.R. § 3030.523(e)(2)(iii), a rate incentive can only be included in a percentage change in rates calculation if it is a "rate of general applicability," which is defined at 39 C.F.R. § 3030.501(g). Furthermore, 39 C.F.R. § 3030.512(b)(9)(i) requires a notice of rate adjustment which includes a rate incentive that is a rate of general applicability to provide "sufficient information to demonstrate that the rate incentive is a rate of general applicability."<sup>1</sup>

1. Please confirm that the Every Door Direct Mail Retail discount is a rate of general applicability. If confirmed, please provide sufficient information to demonstrate that the Every Door Direct Mail Retail discount is a rate of general applicability.

### **RESPONSE:**

Confirmed. The notice unequivocally states that the discount will apply to each Every Door Direct Mail (EDDM) Retail mailpiece submitted during the promotional period, with nothing further required from the mailer beyond what normally transpires when a mailing is submitted.<sup>2</sup> It is not clear to the Postal Service why this information would be deemed insufficient in demonstrating that the EDDM Retail discount is a rate of general applicability.

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<sup>1</sup> The Commission recently finalized amendments to its rules concerning rates of general applicability within the context of Market Dominant rate adjustments, but those amended rules have not yet become effective. See Docket No. RM2020-5, Order Adopting Final Rules Regarding Rate Incentives for Market Dominant Products, May 15, 2020 (Order No. 5510).

<sup>2</sup> United States Postal Service Notice of Type 1-C Market Dominant Price Change, Docket No. R2020-2 (June 1, 2020), at 3 ("Postage for all EDDM Retail pieces entered between August 1 and September 30, 2020 will be \$0.172 per piece, a 10 percent reduction off of the current permanent rate of \$0.191. No registration is required: all EDDM Retail pieces entered during the promotional period will receive the discount.").